



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*86 Chambers Street, 3rd floor  
New York, New York 10007*

May 14, 2025

**BY ECF**

The Honorable Jeannette A. Vargas  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, New York 10007

Re: *State of New York et al. v. Trump et al.*, No. 25 Civ. 1144 (JAV)

Dear Judge Vargas:

This Office represents the defendants in the above-captioned matter. We attach to this letter the May 12, 2025 declarations of Mark Vetter and Michael Wenzler (“May 2025 Vetter Decl.” and “May 2025 Wenzler Decl.” respectively), and the May 13, 2025 declaration of John York (“York Decl.”). These supplemental declarations “inform the Court regarding a change in information relating to [Treasury] DOGE Team member Samuel Corcos.” May 2025 Wenzler Decl. ¶ 2.<sup>1</sup>

On May 2, 2025, Mr. Corcos was appointed to the position of Deputy Assistant Secretary for Information Systems (DAS-IS) and Chief Information Officer (CIO) under 5 U.S.C. § 3394. *Id.* ¶ 4; York Decl. ¶ 4. This is a paid non-career Senior Executive Service (SES) position, and Mr. Corcos remains a special government employee (SGE). May 2025 Wenzler Decl. ¶ 4; *see also* May 2025 Vetter Decl. ¶ 4 (explaining that Mr. Corcos remains an SGE because his expected departure date is no later than his original 120-day appointment). When Mr. Corcos was appointed to these positions, he relinquished his prior position of Senior Advisor for Technology and Modernization. York Decl. ¶ 4. Under Treasury Order 102-10, *available at*

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<sup>1</sup> Both Mr. Vetter and Mr. Wenzler provided declarations in support of Defendants’ pending Motion to Dissolve the Preliminary Injunction. *See* ECF Nos. 144, 147. John York is the Assistant Secretary for Management at Treasury, serving as the head of Treasury’s Departmental Offices for all purposes relating to administrative functions. York Decl. ¶ 1. Mr. York reports to Secretary Bessent through Deputy Secretary Michael Faulkender, and he exercises supervision over personnel within the Office of the Assistant Secretary for Management. *Id.*

<https://home.treasury.gov/about/general-information/orders-and-directives/treasury-order-102-10> (last visited May 13, 2025), as CIO, Mr. Corcos carries out Treasury duties related to planning, programming, budgeting, and executing decisions related to information technology (IT). York Decl. ¶ 5. He also carries out Treasury's mission of providing secure, efficient, accessible, and effective Treasury IT systems, modernizing Treasury's IT infrastructure and meaningfully improving the delivery of digital services, and improving the management, acquisition, and oversight of Treasury's IT. *Id.* With respect to these duties, Mr. Corcos reports directly to Secretary Bessent and is organizationally responsible to Mr. York. *Id.* With respect to Mr. Corcos's remaining DAS-IS duties, he reports directly to Mr. York. *Id.*

There are no additional trainings required to be completed as a result of this change in position. May 2025 Wenzler Decl. ¶ 4. In addition, because Mr. Corcos has already filed an OGE 278 form, he is not required to complete any additional ethics trainings or forms. May 2025 Vetter Decl. ¶ 4. The other information pertaining to Mr. Corcos that is discussed in Defendants' Motion to Dissolve the Preliminary Injunction and accompanying declarations remains the same (with respect to, *e.g.*, security vetting and clearance and mitigation measures).

We thank the Court for its consideration of these submissions.

Respectfully,

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